

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLEINITIATIVE MERCHANT SOLUTIONS LLC,
a California limited liability company,

Plaintiff,

v.

POSABIT US INC., f/k/a POSaBIT, INC., a
Washington corporation,

Defendant.

No. C22-01724-JCC

JOINT STIPULATED MOTION
AND ~~PROPOSED~~ ORDER TO
AMEND SCHEDULE*Note on Motion Calendar:*
August 7, 2023**STIPULATED MOTION**

The parties, by and through their counsel, stipulate and agree as follows:

Additional interim deadlines related to the disclosure of experts and expert testimony may become necessary, depending on if and when Plaintiff Initiative Merchant Solutions LLC (“IMS”) chooses to designate an expert witness. If IMS discloses an expert witness and the topics on which that expert will opine by October 6, 2023, then the following deadlines shall apply:

Event	Current Deadline	Proposed Deadline
IMS Disclosure of Primary Expert(s) and Topics	<i>n/a</i>	10/06/23
POSaBIT Disclosure of Rebuttal Expert(s) and Topics	<i>n/a</i>	11/06/23
IMS Disclosure of Expert Testimony (Report)	11/06/23	11/06/23

JOINT STIPULATED MOTION AND ~~PROPOSED~~ ORDER
TO AMEND SCHEDULE (C22-01724-JCC) - 1Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

POSaBIT Disclosure of Rebuttal Testimony (Report)	<i>n/a</i>	12/18/23
--	------------	----------

Alternatively, if IMS does not disclose an expert witness and the topics on which that expert will opine by October 6, 2023, and still chooses to submit an expert report, then the following deadlines shall apply:

Event	Current Deadline	Proposed Deadline
IMS Disclosure of Expert Testimony (Report)	11/06/23	11/06/23
POSaBIT Disclosure of Rebuttal Testimony (Report)	<i>n/a</i>	1/16/24

IT IS SO STIPULATED.

DATED this 7th day of August, 2023.

CAMPBELL & BISSELL, PLLC

/s/ William A. Gieri

MICHAEL S. BISSELL, WSBA #24077

WILLIAM A. GIERI, WSBA #52761

Attorneys for Initiative Merchant Solutions, LLC

Campbell & Bissell, PLLC

820 W. 7th Avenue

Spokane, WA 99204

Telephone: (509) 455-7100

Facsimile: (509) 455-7111

Email: mbissell@campbell-bissell.com

wgieri@campbell-bissell.com

DATED this 7th day of August, 2023.

DAVIS WRIGHT TREMAINE LLP

Attorneys for Defendant POSaBIT US Inc.

s/ Zana Z. Bugaighis

Zana Z. Bugaighis, WSBA #43614

John A. Goldmark, WSBA #40980

Daniel A. Fiedler, WSBA #56436

920 Fifth Avenue, Suite 3300

1 Seattle, WA 98104-1610
2 Telephone: 206-622-3150
3 Fax: 260-757-7700
4 Email: zanabugaighis@dwt.com
5 Email: johngoldmark@dwt.com
6 Email: danielfiedler@dwt.com

7 **ORDER**

8 Pursuant to stipulation, IT IS SO ORDERED.

9 DATED the 8th of August 2023.

10 
11

12 JOHN C. COUGHENOUR
13 United States District Court Judge
14
15
16
17
18
19
20
21
22
23
24
25
26
27